

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:19 CR 77 ERW JMB
	)	
SEAN BOURE,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Linda Lane, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with one count of interference with commerce by threats of violence in violation of Title 18, United States Code, Section 1951(a).
2. Pursuant to Title 18, United States Code, Section 3142(g),
  - (a) There is an evidentiary basis to conclude that the defendant is a serial armed business robber; and
  - (b) The defendant has prior assault convictions; and
3. There is a serious risk that the defendant will flee.
4. The defendant is a threat to the community.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

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LINDA LANE ##0011451IA  
Assistant United States Attorney